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July 27, 2018

US DISTRICT COURT, SDNY  
Hon. Victor Marrero, USDJ  
500 Pearl Street  
New York, NY 10007

Re: United States v Frank Giovinco  
Docket No.: 18 Cr 014 (VM)

Dear Honorable Sir:

As you know, I was recently appointed to represent the Defendant, FRANK GIOVINCO, in the above-referenced matter. Please accept this correspondence as a request to temporarily modify the conditions of Mr. Giovinco's pre-trial release conditions.

One of Mr. Giovinco's sons is in high school and being heavily recruited to play lacrosse. He will be performing at a tournament and recruiting "combine" in Lake Placid, NY next week. At the tournament's resorts a number of college recruiters have expressed interest in meeting with Mr. Giovinco and his wife to discuss financial/student-aid packages for scholar athletes at their schools.

Accordingly, Mr. Giovinco requests a temporary modification of his pre-trial release conditions to permit him to go to Lake Placid, NY and stay at the High Peaks Resort from July 30, 2018 through August 5, 2018, in order to meet with college recruiters with and on behalf of his son.

We have asked Officer Anna Lee, Mr. Giovinco's pre-trial supervision officer, whom has no objection to this application. The Government has maintained a position consistently that it opposes any requests by Mr. Giovinco.

Thank you for your time and consideration. Should the Court have any further questions, concerns or directives, please feel free to contact the undersigned.

Respectfully Submitted,

s/Aaron M. Goldsmith

***Via email***

AUSA Jared Lenow

AUSA Jason Swergold